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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE: PLAINTIFFS' MOTION  
FOR ISSUE CERTIFICATION UNDER  
RULE 23(C)(4)**

1 Plaintiffs and Defendant Google LLC (collectively, the “Parties”), by and through their  
2 respective counsel of record, hereby stipulate and agree as follows:

3 WHEREAS, the Court held a Case Management Conference on February 14, 2023; and

4 WHEREAS, at the Conference, the Court advised that Plaintiffs may file a motion for issue  
5 class certification under Rule 23(c)(4); and

6 WHEREAS, the Parties have met and conferred and agreed upon a briefing schedule for that  
7 motion, and

8 WHEREAS, the Court and the Parties are in the process of scheduling a hearing date for the  
9 Parties’ anticipated motions for summary judgment (“Summary Judgment Hearing”).

10 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the  
11 Court’s approval, that:

- 12 1. Plaintiffs shall file any motion for issue certification under Federal Rule 23(c)(4) by  
13 March, 14, 2023.
- 14 2. Google shall file any Opposition by April 11, 2023.
- 15 3. Plaintiffs shall file any Reply by April 25, 2023.
- 16 4. The hearing on Plaintiffs’ Rule 23(c)(4) motion shall take place on the same day as  
17 the Summary Judgment Hearing.

18 DATED: February 23, 2023  
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/s/ Stephen A. Broome

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this Joint Stipulation.  
Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has  
concurred in the filing of this document

Dated: February 23, 2023

By /s/ Mark Mao

Mark Mao

*Counsel for Plaintiffs*

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge